Consultation on non-road mobile machinery

The Netherlands is pleased to be given the opportunity to express its views regarding the revision of Directive 97/68/EC on pollutant emissions from non-road mobile machinery. We welcome this stakeholder consultation, as earlier delays in this procedure have raised our concern.

2013 is the 'EU year of the Air Quality'. In this light, the EU has announced a revision of the EU Air Quality Policy, to (among others) further emphasize measures that reduce emissions directly at the source. In the recently published view on the stakeholder consultation regarding this revision, the Netherlands has stressed the importance of such measures in order to achieve a better air quality.

Implementing measures that reduce pollutant emissions will not only lead to better air quality and healthier lives, they can also offer opportunities for innovation and the development of state of the art technology. Additionally, current marketing strategies have demonstrated that a green(er) image is an important unique selling point.

Giving due consideration to the preparatory work that has been done and respecting discussions still in progress, our position so far regarding the consultation is summarized in bullets below.

Extending the scope to other power categories

Achieving an overall emission reduction can be deployed as an opportunity to level the playing field between regulated and unregulated engines. With this extension of the scope of Directive 97/68/EC a more harmonized European approach can be realised. When furthermore aligning to limits already in force and actually being implemented in substantial external markets such as the U.S., the regulatory requirements can open up a bigger market for European engine manufacturers.

Concretely, the above is reflected in the following positions regarding extensions of the scope:

- We support the extension of the scope of the Directive to power categories below 18 kW and above 560 kW.
- We prefer alignment with the USA in applying the same standards above and below 560 kW.
- Below 19 kW we favour global harmonization, and could accept simplified conformity assessment.
- We prefer harmonization of emission regulations for these engine categories. To achieve this EU-wide emission limit values could be considered matching those already in force in the Netherlands.
- We favour the inclusion of spark-ignited engines above 19 kW in the Directive. A focus on engines running on alternatives like LPG and CNG is needed.
- Vehicles outside the scope of the T or L category need to be accommodated in the NRMM directive.
- We support setting emission limits for snow mobile engines, based on harmonization with the USA and Canada.

Introduction of new stages

Besides extending the scope of the Directive, it is necessary to introduce new stages of emission requirements to achieve the preferred overall emission reduction in non-road mobile machinery. Considering the constant-speed engines and the engines between 19-37 kW we perceive differences

with stringent US limits. Avoiding this gap could deliver substantial environmental benefits. Furthermore, the Netherlands emphasizes the need of introducing new emission limits for Inland Waterway Vessels (IWV) in the short term, given their increasing stake in air pollutant concentrations. In order to regain its qualification as a 'clean en green transport mode', the introduction of stricter limits is needed. A substantial step forward can be made in the short-term, while at the same time introducing longer term design target for the sector. From the perspective of the growing gap between emissions of road and water transport and our concern for a level playing field with older ships, we support measures to reduce emissions within the legacy fleet. The EU already attended to this issue in different programs where 'greening the fleet' is a theme, and the Netherlands welcomes these efforts.

Concretely, the above is reflected in the following positions regarding introduction of new stages:

- For constant speed engines we favor alignment with the USA.
- For engines for Inland Waterway Vessels (IWT) we prefer alignment with the USA (Tier 4), with the exception of the limit for PM, which should be based on best available technology, by means of retrofitting if necessary.
- The scope needs to be extended to cover engines running on gaseous fuels, with consideration of methane emissions.
- Stage V for IWV is incorporating a very stringent standard for NOx as well as PM that necessitates the development of new engines. Harmonization with the USA is an opportunity.
- The Stage IV for 19 – 37 kW should be aligned with the USA. Transition problems for machine manufacturers shall be tackled by a flexibility scheme.
- Stage V: a fixed limit shall be introduced based on best available technology. Exact numbers can be copied from Euro VI for on road. We see no justification to limit the application of a particle number limit to engines 56 – 560 kW. A lower limit of 37 kW (the current Swiss standard) could be considered, if a cost benefit analysis proves this to be an efficient effort.
- With regard to in-service conformity and OBD we prefer similar provisions and procedures to be developed as for Euro VI on road.

Exemptions, derogations and transitional measures

To smoothen the transition towards new stages, the Directive needs to contain appropriate provisions for this purpose.

- It should be considered to replace the existing flexibility schemes by other transitional provisions which are easier to implement and monitor. The draft proposals presented by Germany and France are a good starting point for discussions.
- Adding the production date to the marking of the engine seems a good idea, as well as a limit to the sell off period.
- Reference to relevant UNECE Regulations seems a good idea, as does the replacement of the Directive by a Regulation. Administrative provisions (such as for market surveillance) are supported.
- Extension of the Directive to alternative fuels such as LNG or ethanol would be a good idea. As stated before, we see the need for proper technical measures in order to reduce the possible methane emissions.